

Both Parties have designated experts, exchanged expert reports, and briefed the objections to Plaintiff's expert witness filed by Defendant. The current deadlines to complete discovery, file dispositive motions, and for mediation have passed. The Pre-Trial Conference is currently set for December 17, 2025, with a trial date to be set between January 5, 2026 and January 30, 2026.

The Parties request the Court to extend the pretrial deadlines and to set a status conference to discuss new settings to permit this case to proceed as quickly and efficiently as possible, but to allow the parties to complete discovery once the claims and parties are established. These extensions are not sought for delay, and the remaining deadlines on the Court's governing scheduling order and trial date will not be impacted by the extension requested above.

The parties respectfully request a Status Conference and potentially the entry of an amended scheduling order depending on the outcome of the conference and either granting or denying of pending Motions.

WHEREFORE, the parties jointly request the Court extend the deadlines as requested herein and schedule a Status Conference as requested and for the Court an opportunity to address the pending motions and a short period thereafter for the parties to engage in any additional discovery, including necessary depositions, and trial preparation needed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this 5th of September 2025, a true and correct copy of the foregoing was served on all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Donald M. Kaiser Jr.
Donald M. Kaiser Jr.